

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

EMMANUEL C. GONZALEZ,

Plaintiff,

vs.

ZULILY, INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

**Case No. 2:14-cv-0630
Consolidated Lead Case**

JURY DEMAND

SOCIAL CONCEPTS, INC.

§

Case No. 2:14-cv-0650

AUTOTRADER.COM, INC.

§

Case No. 2:14-cv-0651

JOINT MOTION FOR ENTRY OF DISCOVERY ORDER

Plaintiff Emmanuel C. Gonzalez and Defendants Zulily, Inc, Social Concepts, Inc., and Autotrader.com, Inc. jointly move the Court for entry of the Proposed Discovery Order submitted herewith. The parties have conferred and agree on the content of the Proposed Order.

September 16, 2014

Respectfully submitted,

/s/ M. Scott Fuller

M. Scott Fuller

Texas Bar No. 24036607

sfuller@lockelord.com

Paul D. Lein

Texas Bar No. 24070133

plein@lockelord.com

Darrian L. Campbell

Texas Bar No. 24087250

dcampbell@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2200

Dallas, Texas 75201-6776

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

ATTORNEYS FOR PLAINTIFF

EMMANUEL C. GONZALEZ

/s/ Ryan J McBrayer w/ permission

Ryan J McBrayer

Perkins Coie LLP - Seattle

1201 Third Avenue

Ste 4900

Seattle, WA 98101-3099

206-359-3073

Fax: 206-359-4073

Email: rmcbrayer@perkinscoie.com

ATTORNEY FOR DEFENDANT

ZULILY, INC.

/s/ John M Guaragna w /permission

John M Guaragna
DLA Piper US LLP - Austin
401 Congress Ave
Suite 2500
Austin, TX 78701-3799
512/457-7000
Fax: 512/457-7001
Email: John.Guaragna@dlapiper.com

**ATTORNEY FOR DEFENDANT
SOCIAL CONCEPTS, INC.**

/s/ Alan D Albright w/ permission

Alan D Albright
Sutherland Asbill & Brennan LLP - Austin
600 Congress Avenue
Suite 2000
Austin, TX 78701
512-721-2710
Fax: 512-721-2656
Email: alan.albright@sutherland.com

**ATTORNEY FOR DEFENDANT
AUTOTRADER.COM, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2014, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to all counsel of record. The foregoing document is being filed under seal.

/s/ M. Scott Fuller